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*Attorneys for Creditor Aditi Technologies  
Private Limited*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re	:	Chapter 11 Case No.
	:	
LEHMAN BROTHERS HOLDINGS, INC.,	:	08-13555 (JMP)
<i>et al.</i>	:	
	:	(Jointly Administered)
	:	
Debtors.	:	
	:	

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**OBJECTION OF ADITI TECHNOLOGIES PRIVATE LIMITED TO PROPOSED  
CURE AMOUNT**

Aditi Technologies Private Limited (“Aditi”), by its undersigned attorneys, objects as follows to the cure amount proposed in the Debtors’ October 6, 2008 First Omnibus Notice of Assumption and Assignment of Executory Contracts and Unexpired Leases (the “Notice”):

1. Prior to the Debtors’ Petition Date, Aditi and Lehman Brothers, Inc. (or one or more of its affiliates; “LBI”) entered into a Master Services Agreement (“MSA”). Pursuant to the MSA, Aditi was obligated to perform certain services and provide certain work product to LBI.
2. The list of executory contracts appended to the Notice correctly references the MSA but incorrectly states the cure amount as “\$0.”

3. The amounts currently owing to Aditi under the MSA in fact total \$233,468.00, as set forth on three invoices (PA-1086, PA-1085, PA-1082), copies of which are attached hereto as Exhibit A.

4. Aditi respectfully requests that the Court grant this Objection and find that the correct cure amount under the MSA is not less than \$233,468.00.

5. Aditi hereby expressly reserves its right to make further objections and claims as may be appropriate and amend, modify and supplement this Objection, including, without limitation, for additional funds owing to Aditi from the Debtors.

Dated: October 16, 2008

Seattle, Washington

GRAHAM & DUNN, PC

By /s/ Stacey A. Walters

Mark D. Northrup (WSBA #16947)

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*Attorneys for Creditor Aditi Technologies  
Private Limited*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Objection was served, via filing through the Court's ECF system, this 16<sup>th</sup> day of October, 2008.

/s/ Stacey A. Walters

Stacey A. Walters

## **EXHIBIT A**

# ADITI®

2002, 156th Ave NE, Suite 200  
Bellevue, WA 98007 USA

Invoice	PA – 1086
Date	September 9, 2008
Page	1

**Bill to:**

Lehman Brothers Holdings Inc.  
Global Architecture and Engineering  
70, Hudson Street, 8<sup>th</sup> Floor  
Jersey City, NJ 07302, USA

**Ship to:**

Lehman Brothers Holdings Inc.  
Global Architecture and Engineering  
70, Hudson Street, 8<sup>th</sup> Floor  
Jersey City, NJ 07302, USA

Purchase Order No	Customer ID	Payment Terms	Due Date
SOW Dated 27-Mar-08	LEHMAN	Immediate	October 9, 2008
Item	Description	Amount	
1	Towards Charges for Completion of deliverables as per SOW for Project 2, 3 & 4.  ( requirement gathering, High level Design Documentation, release notes & Development Cost Estimation)	\$ 30,000.00	
<b>Payment mode:</b>  You can choose between the 2 options:  1. An electronic Money Transfer to Bank of America Swift Code: BOFAUS3N Routing #: 026009593 Account #: 69088912 Beneficiary name: Aditi Technologies Private Limited Branch Address: 10555 NE 8th Street, Bellevue, WA 98004 Branch#: 37068  2. ACH Credits Routing #: 125000024 Account #: 69088912		Subtotal	\$30,000.00
		Tax	0
		<b>Total</b>	<b>\$30,000.00</b>

# ADITI®

2002, 156th Ave NE, Suite 200  
Bellevue, WA 98007 USA

Invoice	PA - 1085
Date	September 8, 2008
Page	1

<b>Bill to:</b>
Lehman Brothers Holdings Inc. Accounts Payable 745 Seventh Avenue New York, NY 10019

<b>Ship to:</b>
Lehman Brothers Holdings Inc. 745 Seventh Avenue New York, NY 10019

Purchase Order No	Customer ID	Payment Terms	Due Date	
	LEHMAN	Net 30	December 08, 2008	
Item	Description	Quantity	Unit Price	Total Amount
1	MindAlign Maintenance fees for the Period October 1, 2008 to September 30, 2009		\$165,968.00	\$165,968.00
<b>Payment mode:</b>  You can choose between the 2 options:  1. An electronic Money Transfer to Bank of America Swift Code: BOFAUS3N Routing #: 026009593 Account #: 69088912 Beneficiary name: Aditi Technologies Private Limited Branch Address: 10555 NE 8th Street, Bellevue, WA 98004 Branch#: 37068  2. ACH Credits Routing #: 125000024 Account #: 69088912			Subtotal	\$165,968.00
			Tax	0
			<b>Total</b>	<b>\$165,968.00</b>

**ADITI®**

2002, 156th Ave NE, Suite 200  
Bellevue, WA 98007 USA

Invoice	PA – 1082
Date	July 14, 2008
Page	1

<b>Bill to:</b>
Lehman Brothers Holdings Inc, Global Architecture And Engineering 70, Hudson Street, 8th Floor Jersey City, NJ 07302, USA

<b>Ship to:</b>
Lehman Brothers Holdings Inc, Global Architecture And Engineering 70, Hudson Street, 8th Floor Jersey City, NJ 07302, USA

Purchase Order No	Customer ID	Payment Terms	Due Date
SOW Dated 27-Mar-08	LEHMAN	Immediate	August 13, 2008
Item	Description	Amount	
1	Towards charges for completion of deliverables as per SOW  (Buddy sync and IMLive migration tool User Manual, Release notes and installation instructions)  (50% of Project-1 cost of \$ 75,000/-)	\$37,500.00	
<b>Payment mode:</b>		-	\$37,500.00
You can choose between the 2 options:		Tax	0
1. An electronic Money Transfer to Bank of America Swift Code: BOFAUS3N Routing #: 026009593 Account #: 69088912 Beneficiary name: Aditi Technologies Private Limited Branch Address: 10555 NE 8th Street, Bellevue, WA 98004 Branch#: 37068		<b>Total</b>	<b>\$37,500.00</b>
2. ACH Credits Routing #: 125000024 Account #: 69088912			

Phone	Fax	Email	Website
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